

1 DICKINSON WRIGHT PLLC  
2 JOHN P. DESMOND, ESQ.  
3 Nevada Bar No. 5618  
4 BROOKS T. WESTERGARD, ESQ.  
5 Nevada Bar No. 14300  
6 MACKENZIE E. ROBINSON  
7 Nevada Bar No. 16309  
8 940 W Liberty Street, Suite 940  
Reno, Nevada 89501  
Tel: 775-343-7500  
Fax: 844-670-6009  
Email: JDesmond@dickinsonwright.com  
Email: BWestergard@dickinsonwright.com  
Email: MRobinson@dickinsonwright.com

*Attorneys for Defendants District Healthcare Services, LLC,  
Breaking Silos in Medicine, LLC, and Habib Shamte, M.D.*

UNITED STATES DISTRICT COURT

**DISTRICT OF NEVADA**

15 CF STAFFING SOLUTIONS, LLC, a Nevada  
16 Limited-Liability Company; MAX CASAL, an  
individual,

17 Plaintiffs,

18 | VS.

19 DISTRICT HEALTHCARE SERVICES, LLC,  
20 a foreign Corporation; BREAKING SILOS IN  
21 MEDICINE, LLC, a foreign corporation;  
HABIB SHAMTE, M.D., an individual; DOES I  
through X; AND ROE CORPORATIONS  
through X, inclusive..

## Defendants.

CASE NO. 2:24-cv-02355-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO REPLY TO  
RESPONSE TO MOTION TO DISMISS  
FIRST AMENDED COMPLAINT AND  
MOTION TO TRANSFER**

(First Request)

Pursuant to LR IA 6-1, Plaintiffs CF Staffing Solutions, LLC (“CF Staffing”) and Max Casal (“Mr. Casal,” together with CF Staffing “Plaintiffs”), by and through their counsel of record, the Law Office of Hayes & Welsh, and Defendants District Healthcare Services, LLC



1 (“District Healthcare”), Breaking Silos in Medicine, LLC (“Breaking Silos”), and Habib Shamte,  
 2 M.D. (“Dr. Shamte,”) together with District Healthcare and Breaking Silos, “Defendants”), by  
 3 and through their counsel of record, Dickinson Wright PLLC, hereby stipulate as follows:

- 4       1. On January 29, 2025, Defendants filed a Motion to Dismiss and Transfer Under  
       28 U.S.C. § 1140(a) (the “Motion to Dismiss”) (ECF No. 12), wherein  
       6 Defendants sought dismissal of certain claims contained in Plaintiffs’ First  
       7 Amended Complaint (“FAC”), and requested that this Court transfer this action to  
       8 the United States District Court for the District of Columbia;
- 9       2. Plaintiffs filed their Opposition to Defendants’ Motion to Dismiss on March 3,  
       10 2025 (ECF No. 20);
- 11       3. Based on scope and complexity of the legal issues involved in Defendants’  
       12 Motion to Dismiss and Plaintiffs’ Opposition, Defendants’ counsel requested  
       13 from Plaintiffs’ counsel a brief, one-week extension for Defendants to file their  
       14 Reply in Support of the Motion to Dismiss, which is currently due March 10,  
       15 2025. Plaintiffs’ counsel agreed to the requested extension.
- 16       4. The parties therefore agree that Defendants’ deadline to file their Reply in  
       17 Support of the Motion to Dismiss should be extended from March 10, 2025, to  
       18 March 17, 2025.
- 19       5. This is the first stipulation for extension of time for Defendants to file their Reply  
       20 in Support of the Motion to Dismiss.
- 21       6. This Stipulation is made in good faith and not for purposes of delay.

22 DATED March 6, 2025

DATED March 6, 2025

23 LAW OFFICE OF HAYES & WELSH

DICKINSON WRIGHT, PLLC

24 /s/ Martin L. Welsh

/s/ Brooks T. Westergard

25 MARTIN L. WELSH, ESQ.

JOHN P. DESMOND, ESQ.

Nevada State Bar No. 8720

Nevada State Bar No. 5618

26 MEGAN M. MCHENRY, ESQ.

BROOKS T. WESTERGARD, ESQ.

Nevada State Bar No. 9119

Nevada State Bar No. 14300

27 LARSON A. WELSH, ESQ.

MACKENZIE E. ROBINSON, ESQ.

Nevada State Bar No. 12517

Nevada State Bar No. 16309

1       199 North Arroyo Grande Blvd., Suite 200  
2       Henderson, Nevada 89074  
3       *Attorneys for Plaintiff, CF Staffing  
Solutions, LLC*

940 W. Liberty Street, Suite 940  
Reno, Nevada 89510  
*Attorneys for Defendants, District  
Healthcare Services, LLC; Breaking Silos  
In Medicine, LLC and Habib Shamte,  
M.D.*

4

5       IT IS SO ORDERED.

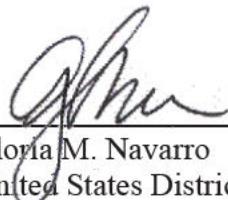
6

7       Dated: March 6, 2025.

8

9

---

10        
Gloria M. Navarro  
United States District Judge

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**CERTIFICATE OF SERVICE**

I certify that I am an employee of DICKINSON WRIGHT PLLC and that on March 6, 2025, I caused a true and correct copy of **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO REPLY TO RESPONSE TO MOTION TO DISMISS FIRST AMENDED COMPLAINT AND MOTION TO TRANSFER** to be served by electronic mail through the Court's CM/ECF filing system upon counsel of record, addressed as follows:

Martin L. Welsh  
Megan M. McHenry  
Larson A. Welsh  
**LAW OFFICES OF HAYES & WELSH**  
199 North Arroyo Grande Blvd., Suite 200  
Henderson, NV 89074  
Tel: (702) 434-3444  
Fax: (702) 343-3739  
Email: mwelsh@lqlaw.com  
Email: mcenry@lqlaw.com  
Email: lwelsh@lqlaw.com  
Email: k.bratton@hayesandwelsh.onmicrosoft.com

/s/ Sherette W. Duffus  
An Employee of Dickinson Wright PLLC

4932-2254-5680 v1 [113463-1]